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FILED IN THE
U.S. DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON
FEB 01 2022
SEAN F. McAVOY, CLERK
DEPUTY
SPOKANE, WASHINGTON

9 UNITED STATES DISTRICT COURT
10 FOR THE EASTERN DISTRICT OF WASHINGTON

11 UNITED STATES OF AMERICA,

2:21-CR-0049-WFN-1

12 Plaintiff,

SUPERSEDING INDICTMENT

13 v.

Vio.: 18 U.S.C. § 875(c)
Threats in Interstate Commerce
(Counts 1, 4)

14 RONALD CRAIG ILG
15 (a/k/a "SCAR215"),

16 Defendant.

17 18 U.S.C. §§ 2261A(2)(B),
2261(b)(5)
Cyberstalking
(Counts 2, 5)

18 18 U.S.C. § 1201(a)(1), (d)
Attempted Kidnapping
(Count 3)

19 18 U.S.C. § 1030(a)(5)(A), (b),
20 (c)(4)(G)(ii)
Attempted Damage to a
21 Protected Computer
(Count 6)

22 18 U.S.C. § 1512(b)(2)
23 Tampering with a Witness
24 (Count 7)
25
26
27
28

18 U.S.C. § 981(a)(1)(C);
28 U.S.C. § 2461(c)
Forfeiture Allegations

The Grand Jury charges:

COUNT 1

Beginning on or about December 31, 2020, and continuing until on or about February 24, 2021, in the Eastern District of Washington and elsewhere, the Defendant, RONALD CRAIG ILG (a/k/a "SCAR215"), knowingly and willfully transmitted in interstate and foreign commerce electronic communications containing a threat to injure Victim 1, to wit: the Defendant used the Internet to send messages directing that Victim 1 "should be given a significant beating that is obvious. It should injure both hands significantly or break the hands," and to transmit Bitcoin currency to pay for the threat being carried out, all in violation of 18 U.S.C. § 875(c).

COUNT 2

Beginning on or about December 31, 2020, and continuing until on or about February 24, 2021, in the Eastern District of Washington, the Defendant, RONALD CRAIG ILG (a/k/a "SCAR215"), with the intent to injure Victim 1, used an electronic communication system of interstate commerce to engage in a course of conduct that caused, attempted to cause, and would be reasonably expected to cause, substantial emotional distress to Victim 1, all in violation of 18 U.S.C. §§ 2261A(2)(B), 2261(b)(5).

COUNT 3

Beginning on or about February 15, 2021, and continuing until on or about April 11, 2021, in the Eastern District of Washington, the Defendant, RONALD CRAIG ILG (a/k/a "SCAR215"), did unlawfully and willfully attempt to seize, confine, kidnap, abduct, and carry away and hold for reward or otherwise, Victim

1 2, and used a means, facility, and instrumentality of interstate and foreign
2 commerce, to include a cellular phone, the Internet, and related instrumentalities,
3 in attempting to commit and in furtherance of the commission of the offense, all in
4 violation of 18 U.S.C. § 1201(a)(1), (d).

5
6 COUNT 4

7 Beginning on or about February 15, 2021, and continuing until on or about
8 April 11, 2021, in the Eastern District of Washington and elsewhere, the
9 Defendant, RONALD CRAIG ILG (a/k/a "SCAR215"); knowingly and willfully
10 transmitted in interstate and foreign commerce electronic communications
11 containing a threat to injure Victim 2, to wit: the Defendant used the Internet to
12 send messages directing that Victim 2 should be "kidnapped for seven days" and
13 "given injections of heroin at least two times a day," and to transmit Bitcoin
14 currency to pay for the threat being carried out, all in violation of 18 U.S.C.
15 § 875(c).

16
17 COUNT 5

18 Beginning on or about February 15, 2021, and continuing until on or about
19 April 11, 2021, in the Eastern District of Washington, the Defendant, RONALD
20 CRAIG ILG (a/k/a "SCAR215"), with the intent to injure and intimidate Victim 2,
21 used an electronic communication system of interstate commerce to engage in a
22 course of conduct that caused, attempted to cause, and would be reasonably
23 expected to cause, substantial emotional distress to Victim 2, all in violation of 18
24 U.S.C. §§ 2261A(2)(B), 2261(b)(5).

25
26 COUNT 6

27 Beginning on or about March 8, 2021, and continuing until on or about
28 March 19, 2021, in the Eastern District of Washington and elsewhere, the
Defendant, RONALD CRAIG ILG (a/k/a "SCAR215"), intentionally attempted to
cause the transmission of a program, information, code, and command, with intent

1 to cause damage without authorization to a protected computer, all in violation of
2 18 U.S.C. § 1030(a)(5)(A), (b), (c)(4)(G)(ii).

3 COUNT 7

4 On or about July 10, 2021, in the Eastern District of Washington, the
5 Defendant, RONALD CRAIG ILG (a/k/a "SCAR215"), did knowingly attempt to
6 corruptly persuade Witness 1 with the intent to cause and induce Witness 1 to
7 withhold testimony from an official proceeding, to wit: *United States v. RONALD*
8 *CRAIG ILG (a/k/a "SCAR215")*, 2:21-CR-0049-WFN-1, in violation of 18 U.S.C.
9 § 1512(b)(2)(A).
10

11 NOTICE OF FORFEITURE ALLEGATIONS
12

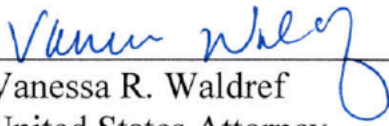
13 The allegations contained in this Superseding Indictment are hereby
14 realleged and incorporated by reference for the purpose of alleging forfeitures.
15 Pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), upon conviction of
16 an offense in violation of 18 U.S.C. 875(c), 18 U.S.C. § 1201(a)(1), (d), and/or 18
17 U.S.C. § 1512(b)(2)(A), as set forth in this Superseding Indictment, the Defendant,
18 RONALD CRAIG ILG (a/k/a "SCAR215"), shall forfeit to the United States of
19 America any property, real or personal, which constitutes or is derived from
20 proceeds traceable to the offense(s). If any of the property described above, as a
21 result of any act or omission of the Defendant:

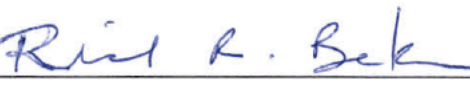
- 22 a. cannot be located upon the exercise of due diligence;
23 b. has been transferred or sold to, or deposited with, a third party;
24 c. has been placed beyond the jurisdiction of the court;
25 d. has been substantially diminished in value; or
26 e. has been commingled with other property which cannot be divided
27 without difficulty,
28

1 the United States of America shall be entitled to forfeiture of substitute property
2 pursuant to 21 U.S.C. § 853(p), as incorporated by 28 U.S.C. § 2461(c).

3 DATED this 1 day of February 2022.

4 A TRUE BILL

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9 Vanessa R. Waldref
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12 Richard R. Barker
13 Assistant United States Attorney
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